

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Law Offices of Bruce J. Chasan, LLC  
Bruce J. Chasan, Esq.

Plaintiffs

vs.

Pierce Bainbridge Beck Price &  
Hecht, LLP  
John M. Pierce, Esq.  
James Bainbridge, Esq.  
Carolynn Beck, Esq.  
Maxim Price, Esq.  
David L. Hecht, Esq.  
Pravati Capital LLC

Defendants

**Civ. No. 2:20-cv-1338-AB**

**JURY TRIAL DEMANDED**

**PLAINTIFFS' REPLY TO PIERCE BAINBRIDGE PARTIES' OPPOSITION  
(ECF 43) TO PLAINTIFF'S MOTION FOR LEAVE TO  
FILE A SURREPLY MEMORANDUM OF LAW (ECF 41)**

Plaintiff's, believing full and robust briefing by all parties assists the Court in rendering the best decision, submit this Reply to the Pierce Bainbridge Parties' letter brief (ECF 43) in opposition to Plaintiff's Motion for Leave to File a Surreply (ECF 41).

1. PB Parties continue to harp on the argument that Hamilton had no interest in settling. But the PB Parties are the reason for that because they grossly exaggerated the merit and value of Hamilton's case and misled him to believe there was a pot of gold at the end of the rainbow. This fantasy, as delusional to the PB Parties as it was to Hamilton, does not take

away from the fact that Chasan Parties created a settlement value. If the PB Parties and Hamilton elected to squander it, that does not take away from the argument that Chasan Parties are entitled to compensation for the value they created, and the PB Parties' use of Chasan's work product in a vain pursuit of extravagant damages.

2. Hamilton's fantasies were buttressed by the luxury rental that Pierce arranged for him in Thousand Oaks, CA by misusing litigation funding. Make no mistake about this. Pierce was not paying for the rental out of his own pocket. Recently Plaintiffs obtained documents filed in Los Angeles, CA in Pierce's divorce and support case with his ex-wife Alyze Pierce. For example, on Nov. 7, 2019, Pierce served an "Income and Expense Declaration" in the proceedings (**Exh. 3** hereto) showing he had state and Federal tax liens of over a million dollars (§ 14), among other debts, including a debt to his ex-wife's mother Etienne Lowen with a balance of \$27,000 and a balance of \$90,000 on a loan from Citibank. According to the Declaration, he received no income from PBBPH Law in the past 12 months (§ 5), he had no investment income (§ 6), his assets in cash and deposit accounts were \$10,750, and the fair market value of his real estate and personal property was negative (§ 11). His estimated monthly expenses were listed as \$49,581 (§ 13). There is no apparent source of funds for the monthly expenses, which suggests improper diversion of funds from litigation funders or from PBPPH Law

3. Again the PB Parties harp on the “pig letter” as “abhorrent.” But Pierce is no choir boy. Plaintiffs have also recently obtained the 7/30/2019 Declaration of Pierce’s ex-wife Alyze requesting a Domestic Violence Restraining Order (**Exh. 4** hereto). Alyze’s Declaration sets forth John Pierce’s repetitive threats of violence and is laced with multiple examples of his 7/27/2019 text messages hurling the F-word and the C-word at her, among other things. The Court should not credit Pierce’s holier-than-thou description of the “pig letter” as vile and abhorrent (albeit it is tame compared to stuff he sends). Pierce uses it as a cover for his theft of client Hamilton. The motion to dismiss should be denied and discovery resumed.

Respectfully submitted,

/s/ Clifford E. Haines

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/s/ Bruce J. Chasan

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*Attorneys for Plaintiffs*

Date: August 10, 2020

**CERTIFICATE OF SERVICE**

I, Bruce J. Chasan, hereby certify that on August 10, 2020, I caused a true and correct copy of the foregoing Reply to the Pierce Bainbridge Parties' opposition (ECF 43) to Plaintiffs' motion for leave to file a Surreply Brief (ECF 41) in Opposition to the Pierce Bainbridge Parties' Motion to Dismiss the Amended Complaint (ECF 25), to be filed via the Court's electronic filing system, which constitutes service upon counsel of record for the Pierce Bainbridge Defendants and to Pravati Capital LLC, as follows:

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/S/ Bruce J. Chasan

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